

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

IAN POLLARD, on behalf of himself,)
And all others similarly situated,)
Plaintiffs,)
v.)
REMINGTON ARMS COMPANY, LLC.,)
SPORTING GOODS PROPERTIES, INC.)
And E.I. DU PONT NEUMOURS AND)
COMPANY)
Defendants.)
Case No.: 4:13-cv-00086-ODS

JOINT MOTION FOR EXTENSION OF DEADLINES

Plaintiff, by and through his attorneys, and Defendants by and through their attorneys, hereby move this Court to enter an Order extending the deadlines imposed by the Scheduling Order dated June 27, 2013 [#45], and state as follows:

1. That the parties have been diligently working to meet the deadlines set by the Court's Scheduling Order of June 27, 2013.

2. That due to the schedules of counsel for Plaintiff and Defendants, and the complexity of the issues involved in the case, the parties need more time to complete discovery and prepare pleadings.

3. The parties jointly propose the following modified discovery and briefing deadlines for class certification.

- A. Plaintiff shall identify experts he intends to rely on for issues relating to class certification and provide a report on or before November 7, 2013;
- B. Defendant shall identify experts they intend to rely on for issues relating to class certification and provide a report on or before December 9, 2013;

C. Plaintiff shall file his motion for class certification on or before January 27, 2014;

D. Defendants' response to Plaintiff's motion shall be filed on or before March 3, 2014;

E. Plaintiff's reply shall be filed on or before March 31, 2014.

WHEREFORE, Plaintiff and Defendants respectfully request that this Court enter an order extending the deadlines as proposed above.

Dated: July 15, 2013

By: /s/ R. Seth Crompton
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On behalf of Plaintiff

Dated: July 15, 2013

By: /s/ Dale G. Wills
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On behalf of Defendants

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2013, I caused a copy of the foregoing document to be served upon all counsel of record via ECF Notice of Electronic Filing.

/s/ R. Seth Crompton
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